

# EXHIBIT U

## Paul A. Woodard

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**From:** Paul A. Woodard  
**Sent:** Sunday, November 06, 2016 3:51 PM  
**To:** 'Ken Hiller'  
**Cc:** 'sandrews@kennethhiller.com'; 'Tim Hiller'  
**Subject:** RE: Wagner v. Ilecki

Ken,

Further to our discussion on Thursday, we agree to limit Seth Andrews' deposition to the topic of his communications with Chiari & Ilecki prior to the commencement of this action, concerning the matters at issue in this action (provided that you agree not to call Mr. Andrews as a witness at trial on any other topics).

We still are considering your proposal regarding entering into a stipulation in lieu of deposing Mr. Andrews. Therefore, I propose that we agree to (1) adjourn Mr. Andrews' deposition and (2) jointly ask the Court to extend the current discovery deadline by 45 days. That should give us ample time to explore alternatives to taking Mr. Andrews' deposition and hopefully avoid the need for motion practice altogether.

Please let me know whether you agree. If so, I will submit a letter request for an extension to the Court.

Thanks,

Paul

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**From:** Ken Hiller [<mailto:khiller@kennethhiller.com>]  
**Sent:** Friday, November 04, 2016 5:17 PM  
**To:** Paul A. Woodard  
**Cc:** [sandrews@kennethhiller.com](mailto:sandrews@kennethhiller.com); 'Tim Hiller'  
**Subject:** Wagner v. Ilecki

Paul:

I did not hear from you today, and the deposition was noticed for November 8. I would like to receive written confirmation that either 1) you agree to limit the deposition to questions of Mr. Andrews to the conversation he had with Mr. Ilecki's office, or 2) that you will withdraw the deposition notice based upon our stipulation that Mr. Andrews will not be called as a witness at trial.

If you are not agreeable to numberr 2 above, I will be filing a Motion for a Protective Order on Monday.

Kenneth Hiller

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